## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

| UNITED STATES OF AMERICA | ) | No. 21 CR 698                     |
|--------------------------|---|-----------------------------------|
|                          | ) |                                   |
| v.                       | ) | Judge Robert W. Gettleman         |
|                          | ) | Magistrate Judge Sunil R. Harjani |
| RONALD T. MOLO           | ) | Under Seal                        |

## **GOVERNMENT'S MOTION TO UNSEAL THE CASE**

The UNITED STATES OF AMERICA, by its attorney, JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, hereby moves to unseal this case for the reasons set forth below:

- 1. On November 15, 2021, a grand jury returned an indictment charging defendant ROBERT T. MOLO with six counts of wire fraud (18 U.S.C. § 1343). The Clerk of the Court issued a bench warrant on November 16, 2021.
- 2. On November 23, 2021, MOLO voluntarily surrendered to the FBI in Tampa, Florida. MOLO is currently in the custody of U.S. Marshals in that district, awaiting his initial court appearance.
- 3. The case, court docket, and all court filings are currently under seal and not accessible to any member of the public.
- 4. For purposes of conducting MOLO's initial court appearance and all future court proceedings, the government now requests that the case be unsealed so that the indictment and court docket are publicly accessible.

WHEREFORE, the government respectfully requests that the Court issue an order unsealing this case.

Respectfully submitted,

JOHN R. LAUSCH, JR. United States Attorney

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